

{In Archive} Re: Fw: Hydrostatic Test Water Discharge - PCB Analysis

Amy Hensley to: TJanssen

01/15/2009 11:36 AM

Archive:

Cc: Michael Calhoun, Molly Finn, David Hockey, Anton Martig This message is being viewed in an archive.

Mr. Janssen,

From what you describe, it appears the water could be PCB waste (defined in 40 CFR 761.3).

The TSCA regulations give treatment standards for water that is PCB waste:

40 CFR 761.50(a)(3) - "No person may discharge water containing PCBs to a treatment works (as defined § 503.9(aa) of this chapter) or to navigable waters unless the PCB concentration is <3 ug/L (approximately 3 ppb), or unless the discharge is in accordance with a PCB discharge limit included in a permit issued under section 307(b) or 402 of the Clean Water Act."

I recommend that you contact your Regional PCB Coordinator who can give you advice specific to your circumstances. Minnesota is in Region 5 and the Coordinator there is Tony Martig (martig.anton@epa.gov, 312-353-2291).

If you have any questions, please let me know.

Regards,

Amy Hensley Cleanup Programs Branch Program Implementation & Information Division Office of Resource Conservation & Recovery U.S. EPA 703-305-5084

Mike, It seems to me that the discharge of water,... 12/19/2008 07:51:01 AM Johnh Smith

From: Johnh Smith/DC/USEPA/US

To: Michael Calhoun/DC/USEPA/US@EPA

Lynn Vendinello/DC/USEPA/US@EPA, Peter Gimlin/DC/USEPA/US@EPA, Tony Cc:

Baney/DC/USEPA/US@EPA, Molly Finn/DC/USEPA/US@EPA, Amy

Hensley/DC/USEPA/US@EPA

Date: 12/19/2008 07:51 AM

Re: Fw: Hydrostatic Test Water Discharge - PCB Analysis Subject:

Mike,

It seems to me that the discharge of water, which: (a) has been used for hydrostatic (leak) testing in natural gas pipelines (which contain regulated PCBs in use in accordance with 40 CFR 761.30(i)) and (b) is no longer in the pipeline or is set to be discharged, would potentially be a PCB remediation waste, depending on its PCB concentration. I am sending a copy of my response to you and your incoming message to my colleagues in the Office of Solid Waste (OSW). OSW is now managing the PCB disposal program and will answer disposal-related questions about PCBs in the TSCA world. It may be that the Office of Water may also regulated this water, depending on how it would be discharged.

John

Michael Calhoun

Do we have a formal policy on this?? What can... 12/18/2008 06:19:24 PM

Michael Calhoun/DC/USEPA/US

12/18/2008 06:19 PM

To Johnh Smith/DC/USEPA/US@EPA, Tony Baney/DC/USEPA/US@EPA, Geraldine Gardner/DC/USEPA/US@EPA

СС

Subject Fw: Hydrostatic Test Water Discharge - PCB Analysis

Do we have a formal policy on this?? What can we tell them?? ----- Forwarded by Michael Calhoun/DC/USEPA/US on 12/18/2008 06:15 PM -----



"Tom M. Janssen" <TJanssen@Merjent.com> 12/18/2008 12:01 PM

To Michael Calhoun/DC/USEPA/US@EPA

cc Linda Koon <LKoon@Merjent.com>

Subject Hydrostatic Test Water Discharge - PCB Analysis

Mr. Calhoun.

Thank you for your time today discussing PCBs in relation to hydrostatic testing. I work closely with interstate natural gas and petroleum pipeline companies with regard to various compliance-related issues. The question came up last week if there is any guidance at the US EPA that outlines PCB compliance parameters relating to the discharge of hydrostatic test water discharge. My rule of thumb is that if PCBs are found to be present in test water based on water analysis, then the water should be disposed of at a licensed waste water treatment facility. However, the question still remains: is there an acceptable level of PCBs that would allow a discharge to proceed to the ground or waterway in accordance with Federal regulations. Any feedback on this issue would be greatly appreciated.

Thanks again for your insights on this matter.

Tom Janssen



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